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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In The Matter of)

Amendment of Section 73.202(b),)
 Table of Allotments,)
 FM Broadcast Stations)
 (Cordele, Dawson,)
 Montezuma, Leary, Hawkinsville,)
 Cusseta, Cuthbert, & Nashville,)
 Georgia))

MM Docket 93-270

RM-8323

RM-8339

RECEIVED

JAN - 4 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To:

Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

REPLY COMMENTS

Radio Cordele, Inc. ("RCI") licensee of WKKN(FM) Cordele, Georgia and one of the original petitioners in the above captioned proceeding, hereby files its Reply Comments. At the close of the Comment Period there were three counterproposals filed. Two of these are in conflict with the RCI petition and therefore also in conflict with the Dawson Broadcasting Company ("DBC") proposal to upgrade WAZE(FM), Dawson, Georgia.

Tifton Broadcasting Corporation ("TBC"), licensee of WJYF(FM), Tifton, Georgia, seeks to upgrade on channel 237C2 which is in conflict with the substitution of channel 236A for channel 252A at Cordele.

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Tri-County Broadcasting Company "(Tri-County)", licensee of WCEH(FM) Hawkinsville, Georgia, seeks substitutions at Cusseta, Montezuma and Hawkinsville, all Georgia, with the end result that WCEH would operate on channel 236C2 in lieu of its present channel 280C3. This places the Tri-County Counterproposal in conflict with the allocation of channel 236A at Cordele.

The attached engineering statement demonstrates that there is also conflict between the Tri-County and TBC Counterproposals. Therefore, the Commission must decide between the RCI/DBC & TBC or Tri-County scenarios. RCI is not opposed to the upgrade of other properties, however, it is extremely interested in the substitution of channel 236A for channel 252A at Cordele.

The Commission presently uses an allotment criteria set forth in Revision of FM Policies and Procedures, (1982) when deciding between conflicting proposals. The Section 307(b) mandate for the distribution of various channels are decided as follows:

- (1) First full-time aural service
- (2) Second full-time aural service
- (3) First local Service: and
- (4) Other public interest matters.

[co-equal weight given priorities (2) and (3)]

There are no areas where any pending proposals provide a service under criteria (1) or (2). The DBC

Counterproposal does propose to offer a first local service to Leary, Georgia, in Option I and II by seeking a change in the city of license of WAZE. Therefore, the conflict between the RCI petition to delete channel 252A at Cordele and substitute channel 236A (which in turn will be channel 236C3) must be compared to the Tri-County Counterproposal on priority (2) and (4).

TRI-COUNTY BROADCASTING COMPANY COUNTERPROPOSAL

[Legally and Technically deficient and should be dismissed]

The Tri-County Broadcasting Company Counterproposal proposes a mutually exclusive channel swap between channel 236A at Montezuma and channel 280C3 at Hawkinsville. This scenario conflicts with the substitution of channel 236A at Cordele since Tri-County proposes to operate its WCHZ on channel 236 as a class C2. In order to allocate channel 236C2 at Hawkinsville, Tri-County proposes a channel swap with the channel 236A allocation at Montezuma, and Montezuma Broadcasting ("MB") files an expression of interest in the allocation of channel 280C3 at Montezuma. Channel 264A must be substituted for channel 279A at Cusseta and channel 264A at Cuthbert deleted for this scenario.

According to the attached engineering statement, it appears that the Tri-County Counterproposal was not legally and technically correct at the time of its filing. All counterproposals must have all technical problems corrected before filing and the Tri-County Counterproposal has a short

space to the allocation of channel 236C3 at Harlem, Georgia. A CP has been issued to the licensee of WCHZ(FM) Harlem, but according to previous Commission procedure, the allocation coordinates must be protected until an application for license is filed (Form 302) for the CP site. The CP was issued on 12/7/93. No application for license has been filed. Tri-County did not offer any documentation that the licensee of WCHZ was willing to have his allocation coordinates modified to be the same as his CP site. The Tri-County Counterproposal did not address this issue and is therefore technically short spaced to channel 236C3 at Harlem and is procedurally incorrect.

Additionally, the Tri-County Counterproposal proposes to delete channel 264A at Cuthbert. It appears that no opportunity for expressions of interest has been given nor has an "applications window" been opened at Cuthbert. Here again, the Tri-County Counterproposal appears to be procedurally deficient.

Because of the two previously discussed deficiencies, RCI request that the Commission never consider the Tri-County Counterproposal suitable for filing.

IIFTON BROADCASTING CORPORATION COUNTERPROPOSAL

[AFTER MODIFICATIONS, NOT MUTUAL EXCLUSIVE WITH RCI/DBC]

The attached engineering statement in the RCI Reply Comments demonstrates that a scenario can be developed whereby the mutual exclusiveness of channel 236A at Cordele

and channel 237C2 at Nashville are eliminated. This involves an antenna site relocation for RCI's WKKN. RCI hereby commits to the Commission that it is willing to accept such relocation in order to substitute channel 236A for channel 252A at Cordele. If channel 236A is substituted for channel 252A at Cordele, RCI will timely file a Form 301 for the modification of the licensed site of WKKN as a class A, and if the opportunity is then available, will seek a "one-step" upgrade. RCI is not looking to others to compensate it for this relocation, but will on its own relocate its antenna site to a point that provides the required city grade service to Cordele and gives separations to other stations in keeping with the Commission's Rules.

Therefore, the TBC Counterproposal is not mutually exclusive with the RCI petition to substitute channel 236A for channel 252A at Cordele. Therefore, WJYF can upgrade to a class C2 at the RCI/DBC modified site, WAZE can upgrade to a class C3 at Dawson or Leary and WKKN can be reassigned to channel 236A and upgrade to a class C3 UNDER "one-step."

With this scenario developed, if the Commission does not dismiss the Tri-County Counterproposal for being procedurally deficient, all gains realized by the upgrade of WAZE, WJYF and WKKN must be considered jointly when in comparison to the Tri-County Counterproposal.

PUBLIC INTEREST SERVED BY DELETING CH 252A AND SUBSTITUTING
CH 236A.

In order for WAZE to be upgraded, channel 252A must be deleted at Cordele, and RCI can then upgrade to a class C3 on channel 236A. There is no way WAZE can upgrade at a desirable site without the deletion of channel 252A at Cordele. Additionally, WKKN will have a mutually exclusive position to upgrade to channel 236C3 (by "one-step") after channel 236A is allocated to Cordele. Finally, since channel 236C2 at Hawkinsville and channel 237C2 at Nashville are mutual exclusive and the relocation of WKKN on channel 236A is not mutual exclusive with channel 237C2 at Nashville, the public interest is served by allowing the WAZE and WJYF upgrade.

DAWSON BROADCASTING COMPANY COUNTERPROPOSAL

In its Counterproposal, DBC requested that its original petition be amended to seek a change in the city of license from Dawson to Leary, Georgia, as a first local service. Option I requested the deletion of channel 252A at Cordele and the substitution of channel 236A. This allows for an upgrade on channel 251C3, and a possible additional upgrade. The "one-step" upgrade of WKKN is also possible in this scenario.

Option II requested a change in the city of license to Leary, but with a site restriction that did not require the deletion of channel 252A at Cordele.

Option III was the same as the original petition. None of the DBC options are in conflict with the allocation of channel 236A at Cordele.

CONCLUSION

DBC, by separate document, is endorsing the attached engineering statement. RCI's Petition and the DBC Counterproposal are interrelated, but not mutual exclusive. The conflict between the allocation of channel 236A at Cordele and channel 237C2 at Nashville can be eliminated by a relocating of the WKKN antenna site. Therefore, the TBC Counterproposal is no longer in conflict with the RCI Petition and DBC Counterproposal.

The only remaining conflict is between the allocation of channel 236A at Cordele and channel 236C2 at Hawkinsville. The Tri-County Counterproposal has been found to be legally and technically deficient in so much that not all areas were completed before the Counterproposal was filed. Since Tri-County is deficient, it is not suitable for filing and should be dismissed.

ENGINEERING STATEMENT

In support of

REPLY COMMENTS MM DOCKET 93-270, RM-8323, RM-8339

RADIO CORDELE, INC.

HISTORY

The instant engineering statement is submitted in support of Reply Comments being filed by Radio Cordele, Inc. (RCI) in the above captioned proceeding. Initially in this Docket RCI had petitioned the Commission to allocate channel 236A to Cordele by deleting the assigned Channel 252A (for use by RCI's WKKN) and substituting Channel 290A for Channel 236A at Montezuma, Georgia. This substitution, in turn, allowed Channel 251C3 to be substituted for Channel 251A at Dawson, Georgia. The instant Reply Comments still considers the original petition, but would also like to address the three counterproposals filed at the end of the Comment Period.

Three different parties offered counterproposals in the instant proceeding. Dawson Broadcasting Company (DBC), licensee of WAZE(FM) Dawson, Georgia, submitted a counterproposal with three options. Option I requested the deletion of channel 251A at Dawson and the substitution of channel 251C3 at Leary, Georgia, as a first local service. This option sought a site that requested the substitution of channel 236A for channel 252A at Cordele. Option II also

requested a deletion of channel 251A at Dawson and the substitution of channel 251C3 at Leary, but at a restricted site that allowed this allocation without the substitution of channel 236A for channel 252A at Cordele. Option III was the same as its original petition, deleting channel 251A and substituting channel 251C3 at Dawson after channel 236A is substituted for channel 252A at Cordele. All options requested that the license of WAZE Dawson and WKKN be modified accordingly.

Tri-County Broadcasting Company (Tri-County) and Montezuma Broadcasting (MB) submitted a counterproposal that proposed a mutually exclusive channel "swap" that allocated channel 236C2 for channel 280C3 at Hawkinsville, channel 280C3 for channel 236A at Montezuma, channel 264A for channel 279A at Cusseta and deleting channel 264A at Cuthbert. All communities are located in Georgia.

Tifton Broadcasting Corporation, (TBC) licensee of WJYF(FM) Tifton, Georgia, submitter a counterproposal that requested the substitution of channel 237C2 for channel 237C3 at Nashville, Georgia.

NATURE OF THE CONFLICTS

All of the conflicts concern the use of channel 236A for channel 252A at Cordele. If the licensed site of WKKN is used as reference, the allocation of channel 236C2 at Hawkinsville creates a prohibited short space of 117.67 kilometers. It appears there is no way to avoid this

conflict by providing a substitute channel at Hawkinsville which allows class C2 operation.

If the licensed site of WKKN is used as reference the study coordinates for the substitution of channel 236A for channel 252A at Cordele, there is a prohibited short space of 16.8 kilometers to the study or reference coordinates of the TBC requested channel 237C2 at Nashville. However, this conflict can be eliminated and is discussed in more detail later.

There is no conflict between the DBC counterproposal and the RCI request for the allocation of channel 236A at Cordele. As stated in the Reply Comments of DBC being filed simultaneously with the instant RCI document, DBC continues to support its counterproposal with a strong preference to Options I & III and Option II to be considered only if I & II are unavailable. Options I and III require the substitution of channel 236A for channel 252A at Cordele.

The TBC Counterproposal request the study coordinates of 31° 16' 17" NL; 83° 16' 40" WL. This site with channel 237C2 creates a short space to the licensed site of WKKN on channel 236A. The short space is 16.8 kilometers. However, this is not the only site where channel 237C2 can be allotted to Nashville. If the TBC study coordinates are modified to 31° 14' 09" NL; 83° 17' 32" WL, and the WKKN transmitter site is relocated to 32° 02' 50" NL; 83° 52' 29" WL, both stations meet the Commission's separation criteria in regard to other stations, and the conflict between WKKN

on channel 236A and WJYF on channel 237C2 is eliminated. Additionally, RCI can still take advantage of the Commission's "one step" upgrade procedure and obtain class C3 status by application when a study site northwest of the instant coordinates are used. In the instant Reply Comments, RCI Vice-President, James W. Jennings, states that WKKN's antenna will be relocated to a site that gives full spacing to channel 237C2 at Nashville. The TBC requested site coordinates constitute a site preference and should not be considered when making a decision on the allocation of channel 237C2 at Nashville and channel 236A at Cordele.

There is also a conflict between the counterproposals of TBC and Tri-County. The distance between TBC's channel 237C2 at its furthestmost point south and Tri-County's channel 236C2 at its furthestmost point north still creates a short space of 11.94 kilometers. Other than finding a substitute channel for Nashville or Hawkinsville, there is no way to resolve this conflict.

EXHIBITS EXPLAINED

Exhibit E, figure 1 is an allocations study depicting that channel 237C2 can be allocated to Nashville at the coordinates previously mentioned. City grade service to the community of license will be of no concern since these coordinates are closer to the present WJYF site than the TBC Counterproposal coordinates.

Exhibit E, figure 2 is an allocation study depicting that channel 236A can be allocated to Cordele at the reference coordinates previously mentioned. This study assumes the substitution of channel 290A (or Ch 221A) for channel 236A at Montezuma, a modification of the TBC Channel 237C3 site and the denial of the Tri-County Counterproposal. This study is unrelated to the DBC counterproposals, however, it does allow for the allocation of channel 251C3 at Dawson or Leary.

Exhibit E, figure 3 is a computer generated contour chart demonstrating that channel 236A at Cordele has a location window when channel 237C2 is allocated to Nashville at the RCI modified coordinates. Exhibit E, figure 4 is a similar contour chart based on the same assumptions, but with channel 236C3 at Cordele.

Exhibit E, figure 5 is a portion of a state of Georgia USGS 1:500,000 scale topographic map with the coordinates for the relocation of WKKN plotted. The 70 dBu contour is drawn in. This is an actual contour study with the terrain variations factored in. This map demonstrates that channel 236A at the re-located WKKN coordinates provides the required city grade service to Cordele.

Exhibit E, figure 6 is an allocations study using a reference for channel 236C2 at Hawkinsville at the furthestmost point north. WJYF Nashville is included at its furthestmost point south. There is still a short space of 11.94 kilometers. This study demonstrates that the

counterproposal of WCHE (Ch 236C2) and WJYF (Ch 237C2) are mutually exclusive.

Additionally, the allocation of channel 236C2 at Hawkinsville is short spaced 13.13 kilometers to the allocation coordinates of channel 236C3 at Harlem, Georgia. Previous Commission policy has been that all elements of a counterproposal, both legal and technical, must be complete at the time of its filing. There is no certainty that the CP site will ever be constructed. Therefore, this is a requested allocation with a 13.13 kilometer short space until WCHZ constructs at its CP site and files a Form 302. Based on this technical conclusion, it appears that the Tri-County Counterproposal was not procedurally correct when it was filed.

The Tri-County Counterproposal also calls for the deletion of channel 264A at Cuthbert. It appears that no additional "applications window" has been opened since the previous CP expired. Channel 264A cannot be substituted for channel 279A at Cusseta if it is not deleted at Cuthbert. Based on previous Commission actions, channel 264A cannot be deleted at Cuthbert until the public has had an opportunity to file expressions of interest. Again, it appears that this makes the Tri-County Counterproposal not procedurally correct at the time of its filing.

CONCLUSION

The instant engineering study depicts that the Tri-County Counterproposal and the RCI Petition/DBC Counterproposal are mutually exclusive and there appears to be no way to reconcile the conflict. However, the RCI/DBC scenario is not mutually exclusive with the TBC Counterproposal when the TBC reference coordinates are modified and WKKN's antenna site is re-located to the reference coordinates requested in Exhibit E, figure 2. This substitution in turn allows for the allocation of channel 251C3 at either Dawson or Leary.

Therefore, when making final decisions on the request of RCI/DBC, TBC and Tri-County, the Commission must consider the gains of upgrades for WJYF Nashville, WAZE Dawson/Leary and the future upgrade of WKKN as opposed to the upgrade of WCEH Hawkinsville and a higher class channel at Montezuma.

ENGINEERING STATEMENT

IN SUPPORT OF

REPLY COMMENTS

MM DOCKET 93-270, RM-8323, RM-8339

RADIO CORDELE, INC.

ALLOCATIONS STUDY

[DEPICTING FURTHERMOST SOUTH SITE FOR CH 237C2 @ NASHVILLE]

(USING RCI MODIFIED COORDINATES AS REFERENCE)

31 14 09 N.

Class C2

Search Date

83 17 32 W.

Current rules spacings

01-03-94

Channel 237A - 95.3 MHz

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
WJYF	237C2	Nashville	GA	19.2	4.18	190.0	-185.82 *
Of Concern TBC Counterproposal Coordinates Modification Sought in Instant Comments							
WJYF.C	237C3	Nashville	GA	224.6	9.99	177.0	-167.01 *
Of No Concern CP Site of TBC							
WJYF	237A	Nashville	GA	224.6	9.99	166.0	-156.01 *
Of No Concern License Site of WJYF							
WYSC	237A	Mc Rae	GA	24.0	99.63	166.0	-66.37 *
Of No Concern Ordered to Ch 274A in MM Docket 92-67							
AD236	236A	Cordele	GA	330.5	91.89	106.0	-14.11 *
Of Concern Relocation of WKKN Antenna Proposed 32-02-50 83-52-29							
WCEH	236C2	Hawkinsville	GA	353.0	116.70	130.0	-13.30 *
Of Concern Tri-County Counterproposal Mutually Exclusive with TBC, RCI/DBC							
WTVYFM	238C	Dothan	AL	270.6	187.54	188.0	-0.46 *
WAPEFM	236C	Jacksonville	FL	122.7	187.55	188.0	-0.45 *
WQPW	239C2	Valdosta	GA	163.6	61.39	58.0	3.39 *
WHFE.C	290A	Lakeland	GA	163.5	20.66	15.0	5.66 *
AD290	290C3	Lakeland	GA	137.4	29.44	17.0	12.44
WKXHFM	240A	Alma	GA	59.9	82.03	55.0	27.03
WLML.C	236A	Montezuma	GA	329.2	137.14	106.0	31.14

EXHIBIT E
Figure 1

ENGINEERING STATEMENT

IN SUPPORT OF

REPLY COMMENTS
MM DOCKET 93-270, RM-8323, RM-8339

RADIO CORDELE, INC.

ALLOCATIONS STUDY

[DEPICTING THAT CHANNEL 236A CAN BE ALLOCATED TO CORDELE FOR USE BY WKKN AFTER
TBC CLASS C2 SITE IS MODIFIED]

(USING WKKN ANTENNA RELOCATION SITE AS REFERENCE)

32 02 50 N.	Class A	Search Date
83 52 29 W.	Current rules spacings	01-03-94
	Channel 236 - 95.1 MHz	

Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
------	-----	------	-------	-------	-------	-------	--------

City of Cordele

GA 136.0 12.42

Reference Coordinates:

31-58-00

83-47-00

WCEH 236C2 Hawkinsville

GA 57.6

48.33

166.0

-117.67 *

Of Concern

Tri County Counterproposal

Mutually Exclusive with TBC, RCI/DBC

AD236 236A Cordele

GA 134.9

14.13

115.0

-100.87 *

Of No Concern

Licensed Site of WKKN

WLML.C 236A Montezuma

GA 331.6

31.61

115.0

-83.39 *

Of Concern

Substitution to Ch 290A or 221A Proposed

KCI PKM & DBC Counterproposal, Options I & III

WJYF 237C2 Nashville

GA 146.6

102.98

106.0

-3.02 *

Of Concern

TBC Counterproposal Site

WJYF 237C2 Montezuma

GA 148.4

105.58

106.0

-0.42 *

Of Concern

Modified Site Proposed by RCI/DBC

WDECFM 234C3 Americus

GA 248.1

44.15

42.0

2.15 *

WJYF.C 237C3 Nashville

GA 153.6

108.43

89.0

19.43

AD290 290A Montezuma

GA 333.0

31.40

10.0

21.40

WYSC 237A Mc Rae

GA 89.4

95.31

72.0

23.31

WTGAFM 237A Thomaston

GA 330.5

104.01

72.0

32.01

WTNT 235C1 Tallahassee

FL 192.8

166.98

133.0

33.98

WPCH 235C Atlanta

GA 347.4

200.02

165.0

35.02

EXHIBIT E
Figure 2

ENGINEERING STATEMENT

IN SUPPORT OF

REPLY COMMENTS
MM DOCKET 93-270, RM-8323, RM-8339

RADIO CORDELE, INC.

ALLOCATIONS STUDY

[DEPICTING THAT TRI-COUNTY & TBC COUNTERPROPOSALS ARE MUTUALLY EXCLUSIVE]
 (USING RCI/DBC SITE MODIFICATION - FURTHERMOST NORTH POINT)

32 17 31 N. Class Search Date
 83 27 02 W. Current rules spacings 01-03-94
 Channel 236 - 95.1 MHz

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
WCEHFM	236C2	Hawkinsville	GA	147.3	1.50	190.0	-188.50 *
Of No Concern Tri-County Counterproposal Site							
WJYF	237C2	Nashville	GA	171.8	114.34	130.0	-15.66 *
Of Concern TBC Counterproposal Site							
ALOPEN	236C3	Harlem	GA	35.9	163.87	177.0	-13.13 *
Of Concern Allocation Coordinates of Ch 236C3 @ Harlem Must Be Protected Until CP Site is Licensed							
WJYF	237C2	Nashville	GA	172.7	118.06	130.0	-11.94 *
Of Concern TBC Counterproposal Ch 237C2 @ RCI/DBC Modified site							
WPCH	235C	Atlanta	GA	333.7	187.51	188.0	-0.49 *
WCHZ	236C3	Harlem	GA	41.4	176.53	177.0	-0.47 *
WBYZ	233C	Baxley	GA	120.7	109.83	105.0	4.83 *
WTGAFM	237A	Thomaston	GA	304.9	110.89	106.0	4.89 *
WJYF.C	237C3	Nashville	GA	176.3	124.47	117.0	7.47 *
WJYF	237A	Nashville	GA	176.3	124.47	106.0	18.47
WAPEFM	236C	Jacksonville	FL	141.8	278.00	249.0	29.00
WDECFM	234C3	Americus	GA	241.7	91.95	56.0	35.95
AD237	237A	Greenville	CA	298.4	142.00	106.0	36.00
AD290	290A	Montezuma	GA	270.9	54.22	15.0	39.22
WMKO.C	235C3	Millen	GA	71.9	157.07	117.0	40.07
WTNT	235C1	Tallahassee	FL	202.1	205.09	158.0	47.09

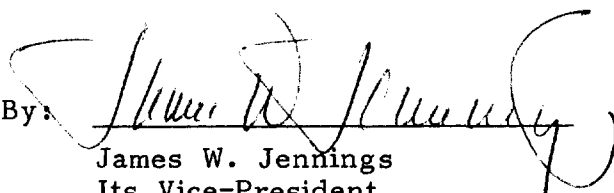
EXHIBIT E
Figure 6

CERTIFICATION

I, James W. Jennings, Vice-President of Radio Cordele, Inc., Petitioners for a channel substitution of Channel 236A for Channel 252A at Cordele, Georgia, and the modification of the license of WKKN(FM) accordingly, do hereby verify that the statements contained in these Reply Comments (for MM Docket 93-270) are true and correct to the best of my knowledge and belief. I represent that these comments are not filed for the purpose of impending, obstructing, or delaying determination on any other application or petition with which it may be in conflict.

Respectfully Submitted,
RADIO CORDELE, INC.

By:


James W. Jennings
Its Vice-President

Radio Cordele, Inc.
P.O. Box 460
Cordele, Georgia 31015-0460

CERTIFICATION

I, Paul Reynolds, hereby certify the following: that I am an independent broadcast consultant; that I hold a Bachelor of Science degree in Communications from the University of Southern Mississippi and have completed work for a Masters Degree in Communications from the University of Alabama; I have been a practicing consultant since 1980, and I am familiar with the Commission's rules and regulations; I have filed numerous petitions and applications in association with Amerimedia, Inc., and my qualifications are known in the industry and at the Commission; I have been retained by Radio Cordele, Inc., to prepare this Engineering Statement in support of "Reply Comments" in MM Docket 93-270.

All information in this engineering statement was prepared by me or under my direct supervision. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Signed Paul Reynolds
PAUL REYNOLDS, CONSULTANT

THIS 3rd DAY OF JANUARY, 1994

415 NORTH COLLEGE STREET
GREENVILLE, ALABAMA 36037
(205) 382-8048

CERTIFICATE OF SERVICE

I Paul Reynolds, Consultant to Radio Cordele, Inc. do hereby certify that I have cause to be mailed this 4th Day of January, 1994, a copy of the attached Reply Comments to the persons listed below by US mail, first class, postage prepaid.

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